

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA**

IN RE:

RUSSELL EDWIN ANDERSON	:	CASE NO. 22-60960
D/B/A K&R CONSTRUCTION	:	CHAPTER 11
	:	JUDGE REBECCA CONNELLY

**Application for Extension of Time to File
Chapter 11 Schedules and Statements**

Russel Edwin Anderson, d/b/a K&R Construction, as Debtor and Debtor-in-Possession in these proceedings (the “Debtor”), by counsel, hereby files this application (the “Application”) for entry of an order granting an extension of time for the Debtor to file its remaining chapter 11 schedules and statements, and in support thereof, respectfully represents:

1. On September 22, 2022 (the “Petition Date”), the Debtor filed with the Court a voluntary petition for relief under Chapter 11 of the Bankruptcy Code, thereby commencing the above-captioned Chapter 11 case (the “Case”). The Debtor elected to proceed under Subchapter V of Chapter 11.

2. The Debtor continues in the possession of its property and continues to operate and manage its business as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

3. On September 26, 2022, William E. Callahan, Jr., was appointed as Subchapter V Trustee. No official committee of unsecured creditors has been appointed in this case as of the date of this motion.

4. Pursuant to Rule 1007, all remaining required schedules and statements must be filed by 10/6/2022.

5. The Debtor's petition was prepared and filed quickly in response to collection activity. Despite diligent efforts, counsel and the Debtor have not completed the remaining required schedules and statements for the Case.

6. It is requested that the Court grant the Debtor an extension of time so that counsel may have additional time to continue to meet with the Debtor and properly complete the necessary schedules and statements.

7. This application is not made for the purposes of delay and no creditor will suffer any prejudice if the Debtor is granted an additional extension of time. The Meeting of Creditors is scheduled for 10/24/2022 at 1:00 P.M. Should this motion be granted, creditors and all parties in interest will have ample time to review the schedules prior to the Section 341 hearing

WHEREFORE, Debtor requests that this Court grant an extension of time until 10/12/2022 in which to file the remaining chapter 11 schedules and statements.

Date: October 6, 2022

RUSSELL EDWIN ANDERSON
D/B/A K&R CONSTRUCTION

By: /s/ David Cox
Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2022, I filed the foregoing Application using the CM/ECF filing system, causing service by electronic notice upon all parties requesting electronic notice, and on the same date served the parties listed below.

Party	Method of Service
All parties on the mailing matrix in this case	by first class mail, postage prepaid

/s/ David Cox
David Cox